

Via E-Filing

May 29, 2014

Carlotta S. Stauffer, Director Office of Commission Clerk Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399

RE: Docket No. 140008-OT: Applications for Qualified Representative Status

Dear Ms. Stauffer:

Please find enclosed for filing (in Docket No. 140008-OT) The Alliance for Solar Choice's *Request to Name Thadeus B. Culley as Qualified Representative* and attached affidavit. Do not hesitate to contact me if you have any questions regarding this filing.

Sincerely,

/s/

Anne Smart Executive Director The Alliance for Solar Choice 595 Market St, 29th Floor San Francisco, CA 94105 Phone: 408-728-7166.

anne@allianceforsolarchoice.com

Enclosures: Request to Name Thadeus B. Culley as Qualified Representative

Affidavit

Certificate of Service

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Applications for Qualified Representative Status)	DOCKET NO. 140008-OT
)	
)	FILED: May 29, 2014

REQUEST TO NAME THADEUS B. CULEY AS QUALIFIED REPRESENTATIVE

Pursuant to Rule 28-106.106, Florida Administrative Code, The Alliance for Solar Choice ("TASC") respectfully requests that Thadeus B. Culley, of the law firm Keyes, Fox & Wiedman LLP, be named as TASC's qualified representative, in anticipation of TASC's intervention in consolidated Docket Nos. 130199-EI, 130200-EI, 130201-EI, 130202-EI, 130203-EM, 130204-EM, and 130205-EI, as well as for all other docketed and non-docketed matters before the Florida Public Service Commission ("Commission") during 2014.

1. Mr. Culley's business address is as follows:

Thadeus B. Culley Keyes, Fox & Wiedman LLP 401 Harrison Oaks Blvd., Suite 100 Cary, NC 27514 (510) 314-8205 tculley@kfwlaw.com

2. Consistent with Rule 28-106.106(2)(b), TASC is aware that it has the right to be represented by "counsel", as that term is defined in Rule 28-106.106(1) and has chosen otherwise.

3. TASC submits that Mr. Culley possesses the requisite qualifications to

responsibly represent TASC's interest in matters before the Commission. Mr. Culley's

qualifications are set forth in the attached affidavit.

4. As reflected in the attached affidavit, Mr. Culley: (i) is an attorney in good

standing that is licensed to practice law in the states of North Carolina and California; (2) has

reviewed the relevant portions of Florida Statutes relative to the Commission's jurisdiction; (iii)

has reviewed the Florida Rules of Procedure relating to discovery rules in an administrative

proceeding; and (iv) has reviewed portions of the Florida Administrative Code and Florida

Statutes related to the rules of Evidence, including the concept of hearsay in an administrative

proceeding.

5. Mr. Culley has acquired or will acquire actual knowledge of the factual and legal

issues involved in all docketed or non-docketed matters to which he will represent the interest of

TASC.

WHEREFORE, for the above and foregoing reasons, TASC respectfully request that its

Request to Name Thadeus B. Culley as Qualified Representative be granted.

Respectfully submitted this 29th day of May, 2014,

BY /s/ Anne Smart

Anne Smart

Executive Director The Alliance for Solar Choice 595 Market St, 29th Floor

San Francisco, CA 94105

Phone: 408-728-7166.

anne@allianceforsolarchoice.com

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Applications for Qualified Representative)	DOCKET NO. 140008-OT
Status)	
)	

AFFIDAVIT

THADEUS B. CULLEY, being first duly sworn, states that:

- 1. I am an attorney with the law firm Keyes, Fox & Wiedman LLP.
- 2. I represent The Alliance for Solar Choice ("TASC") in regulatory matters related to distributed solar generation.
- TASC has requested that I be named its Qualified Representative,
 pursuant to Rule 28-106.106, Florida Administrative Code, for all docketed and non-docketed matters before the Florida Public Service Commission ("Commission").
- 4. I am a member in good standing with the state bars of California (Bar No. 271602) and North Carolina (Bar No. 47001), and my practice has focused exclusively on energy matters before state regulatory agencies, including the California Public Utilities Commission and the North Carolina Utilities Commission.
- 5. I have knowledge of the following: the Florida Statutes relevant to the Commission's jurisdiction; the Florida rules of Civil Procedure relating to discovery in administrative proceedings; and the Florida Administrative Code and Florida Statutes relative to the rules of Evidence, including the concept of hearsay in administrative proceedings.

- 6. I have knowledge or will acquire knowledge of the factual and legal issues in the matters to which I will participate on behalf of TASC as a Qualified Representative.
- I am in compliance with and will continue to comply with the Standards of Conduct for Qualified Representatives enumerated in Rule 28-106.107, Florida
 Administrative Code.

I declare that the foregoing is true and correct based on my knowledge, information, and belief.

Thadeus B. Culley

Name and Address:

Thadeus B. Culley

Keyes, Fox & Wiedman LLP 401 Harrison Oaks Blvd., Suite 100

Cary, NC 27514

SWORN TO AND SUBSCRIBED before me this 27 day of May, 2014.

County of Wake) ss. State of North Carolina)

Kathy A. Vest

MY COMMISSION EXPIRES 5/6/2018

CERTIFICATE OF SERVICE

I hereby certify that I have caused a true and correct copy of the foregoing *Request to*Name Thadeus B. Culley as Qualified Representative to be furnished electronically and/or by

U.S. Mail to the following on this 29th day of May, 2014:

S. Curtis Kiser General Counsel Florida Public Service Commission Division of Legal Services 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

BY /s/ Anne Smart

Anne Smart Executive Director The Alliance for Solar Choice 595 Market St, 29th Floor San Francisco, CA 94105 Phone: 408-728-7166.

 $\underline{anne@alliancefor solar choice.com}$